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February 1, 2022

Honorable Joseph F. Bianco
Visiting United States District Judge
Eastern District of New York
United States Courthouse
100 Federal Plaza
Central Islip, New York 11722

BY ECF

Re: United States v. Constantine
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendant Tommy Constantine ("Constantine") is currently in custody in District of Arizona and awaits transfer to Federal Bureau of Prisons upon completion of his COVID isolation. His bail has been revoked. For these reasons, Constantine respectfully requests that his bail be exonerated, to the extent such is required after a revocation, and that an Order issue permitting all collateral posted as security for his bail to be released including, but limited to, the properties incumbered and the funds held in his attorney's escrow account so long as they are returned to the appropriate surety or trust account. The government, by Assistant United States Attorney Matthew Haggans, consents to this application.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Matthew Haggans (by ECF)
AUSA Saritha Komatireddy (by ECF)